

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 6/9/20

MEMORANDUM ENDORSED**SAPONE & PETRILLO, LLP**

William S. Petrillo, Esq., Partner
 Edward V. Sapone, Esq., Partner

Chase S. Ruddy, Esq., Senior Associate
 Michael Vitaliano, Esq., Associate

MANHATTAN

1 Penn Plaza, Suite 5315
 New York, New York 10119
 Telephone: (212) 349-9000
 Facsimile: (212) 349-9003
 E-mail: ed@saponepetrillo.com

LONG ISLAND

1103 Stewart Avenue, Suite 200
 Garden City, New York 11530
 Telephone: (516) 678-2800
 Facsimile: (516) 977-1977
 E-mail: william@saponepetrillo.com

June 9, 2020

Hon. Gregory H. Woods
 United States District Judge
 United States District Court
 Southern District of New York
 500 Pearl Street
 New York, NY 10007

Re: *United States of America v. Kin Lui Chen*
Ind. No.: 18-CR-827 (GHW)

Dear Judge Woods:

I am retained counsel to Defendant Kin Lui Chen in the above-referenced case. Mr. Chen was sentenced on March 10, 2020 to time served to be followed by three years of supervised release.

Following Mr. Chen's arrest on August 7, 2018, he turned over to Pretrial Services his United States Permanent Resident Card, Hong Kong ID, and Hong Kong passport. Following Mr. Chen's sentencing, we have been in contact with Pretrial Services. According to Pretrial Services, Mr. Chen must seek a Court Order for the return of his identification documents within 30 days, or Pretrial Services will send the documents to the Department of State.

I am, therefore, writing to respectfully request that the Court order Pretrial Services to release Mr. Chen's identification documents back to him.

I have spoken with the government, by AUSA Daniel Nessim, who has no objection to this request.

As always, Your Honor's consideration is much appreciated.


Respectfully submitted,

/s/ Edward V. Sapone
 Edward V. Sapone

Cc: AUSA Daniel Nessim, Esq.

Application granted. Pretrial Services is authorized to return Mr. Chen's travel documents to him or to his counsel. In light of COVID-19, Pretrial Services may return the documents to Mr. Chen by mail or express mail delivery to an address designated by Mr. Chen's counsel. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 146.

SO ORDERED
 June 9, 2020


 GREGORY H. WOODS
 United States District Judge